

Title: Local Agency Staffing

Purpose

To ensure that each local agency employ or contract with adequate staff to ensure participants receive high-quality nutrition services while maintaining the recommended staff to participant ratio of 300:1 (300 participants to 1 Full-Time Equivalent (FTE)).

Authority

7 CFR 246.6

Policy

Each Local Agency is required to have a WIC Director and adequate Competent Professional Authority (CPA) staff to serve their participant numbers. Employing or contracting the services of a Registered Dietitian (RD) for high-risk participant consulting.

I. Staffing

- A. In a clinic where there is only one employee, that employee is prohibited from being solely responsible for determining the eligibility of an applicant for all certification requirements and for issuing benefits to that participant.
 - 1. **Note:** Due to the rural nature of Montana there may be exceptions to the One Employee rule. Monitoring staff must be made aware of these circumstances and will review the files to ensure compliance and deter fraudulent activities.

II. WIC Director

- A. A WIC Director is responsible for overseeing the administrative aspects of the WIC Program. Typical responsibilities include fiscal management, program planning, staff supervision and serving as a contract liaison.

III. Registered Dietitian

- A. A Registered Dietitian (RD) is responsible for providing nutrition assessment; developing a nutrition care plan and providing education to high-risk participants who, at certification or follow-up visits, are determined to require more in-depth nutrition intervention (Designated Referrals for High Risk Participants). A Registered Dietitian approves medical formula and supplemental food requests for participants.

IV. Competent Professional Authority

- A. A Competent Professional Authority (CPA) is responsible for:
 - 1. Determination of participant nutritional eligibility for the WIC Program
 - 2. Development of a participant's nutrition care plan
 - 3. The assignment of food prescriptions
- B. A CPA provides breastfeeding and general nutrition education to individual participants and small groups. Other responsibilities include promoting and supporting breastfeeding, providing program outreach and making referrals to community services. Non-RD CPA's refer participants requiring more in-depth nutrition intervention to the RD.
- C. Local agency CPA's will be one of the following:
 - 1. Registered Dietitian (RD)

2. Nutritionist with a Bachelor's or Master's degree from any college/university which is accredited/approved by the Commission on Accreditation for Dietetics Education;
 3. Diet Technician, Registered (DTR)
 4. Health-related degreed professionals (such as RN, LPN, Health Promotion, Health Education, Health and Human Development, Community Health, Early Child Development, Exercise Science, Family and Consumer Sciences, or Home Economics) with 6 or more semester credit hours in food and nutrition appropriate to the WIC population (including courses in Basic Nutrition, Nutrition in Life Cycle, Community Nutrition or Nutrition and Disease) and successful completion of an Anatomy/Physiology series of coursework
 5. Other degreed professionals with 12 or more semester credit hours in food and nutrition appropriate to the WIC population (including courses in Basic Nutrition, Nutrition in the Life Cycle and at least one other upper-level nutrition class) and successful completion of an Anatomy/Physiology series of coursework. Nutrition and Anatomy/Physiology coursework must have been completed within the past 10 years, unless the applicant has been working in the Nutrition field
 6. Current Montana WIC CPA as of the original effective date of this policy, August 1, 2003
- D. Submit documentation to the State WIC Office for review:
1. RD and DTR – Commission on Dietetic Registration (Current)
 2. All others – Transcripts documenting Nutrition coursework and Anatomy/Physiology coursework.
- E. Local agencies not able to recruit and hire a qualified CPA may submit a plan to the State WIC Office for approval for temporary CPA coverage. This plan will include:
1. Plans for obtaining a qualified CPA, such as posting the position and hiring, completion of educational requirements by current staff or another person, etc.
 2. Who will serve as the CPA during the temporary situation? This may include:
 - a. Home Economist with an emphasis in nutrition or equivalent (send in transcripts for review by the State WIC Office Nutritionists)
 - b. Registered Nurse
 - c. Physician's Assistant
 - d. Physician
 3. A timeline for obtaining a qualified CPA. The maximum time period allowed for temporary CPA coverage is one year.
- F. Procedure
1. Registered Dietitian and Registered Diet Technician CPA's must provide appropriate registration and/or licensure information to the local agency.
 2. To verify completion of the necessary degree, Nutritionist CPA's will provide transcripts to the local agency prior to hiring.
 3. The local agency will submit transcripts to the State WIC Office for review and approval prior to hiring a "Health-related" or "Other degreed professional" CPA.

4. Local agencies with only one CPA will develop a written contingency plan for CPA coverage during vacations, illness or other extended leave. This plan will be submitted annually with the local agency application.
5. All CPA's will successfully complete the Computer System Training.
6. All CPA's will attend New Employee Orientation and successfully complete the Competency Based Training modules and successfully attain the minimum hours of continuing education per year.
7. All CPA's must complete a minimum of five certifications quarterly.

V. Nutrition Aide

- A. A Nutrition Aide, Program Specialist, Nutrition Assistant or similar job title is responsible for a variety of duties dependent upon the local agency.
 1. Typical job duties include:
 - a. Gathering demographic information
 - b. Screening and determining categorical, residential and financial eligibility
 - c. Gathering height, weight and biochemical information
 - d. Issuing food instruments
 - e. Scheduling appointments
 - f. Making referrals to community services
 - g. Promoting and supporting breastfeeding
 - h. Performing general clerical duties
 - i. Providing program outreach.
 2. Per the Clinical Laboratory Improvement Act regulations, staff performing biochemical tests must possess a high-school diploma or the equivalent.
 3. Nutrition Aides may provide direct nutrition services to individual participants and small groups after completing the appropriate Competency Based Training modules and under the supervision of a CPA. This includes the screening of dietary information, the provision of low-risk nutrition education and the provision of breastfeeding education.

VI. Local Training Coordinator

- A. Each local agency will designate a Local Training Coordinator. This individual is responsible for overseeing the training of WIC staff including the Computer Training, New Employee Orientation, WIC Competency Based Training modules and continuing education.
 1. The Training Coordinator will ensure that:
 - a. New staff complete WIC Computer Training, and the Competency Based Training modules in a timely manner.
 - b. Staff receive required training prior to provision of WIC services with pre-requisite training.
 - c. Staff receive at least the minimum required WIC Continuing Education Credits annually.
 - d. Appropriate and timely staff training is conducted for local agency staff on pertinent WIC topics.

- e. Staff training and education is documented and maintained for review during monitoring visits at the local agency and information on completion of training is sent to the State WIC Office.
- B. Local Training Coordinator Annual Assessment
 - 1. The local training coordinator may assist in conducting an annual assessment to identify areas of staff training needs.
 - 2. The local training coordinator may communicate staff training needs to State WIC Office personnel for future development of programs of benefit for the local agency.
- C. WIC Computer Training
 - 1. Local WIC Program staff must have successfully completed the Montana WIC Computer Training prior to accessing the WIC automated computer system.
- D. Competency Based Training
 - 1. Competency Based training consists of a series of eight self-taught modules.
- E. Continuing Education
 - 1. In order to maintain a current update on issues pertinent to the WIC program, staff is required to obtain continuing education credits from approved sources annually.

VII. Breastfeeding Coordinator

- A. Each local agency will designate a Breastfeeding Coordinator. This individual will be trained to promote and support breastfeeding.

VIII. Retail Coordinator

- A. Each local agency will select a staff member to act as the Retailer Coordinator. This position is the primary local contact for WIC Authorized Retailers. They will be responsible for store visits; annual training and corrective participant and retailer training.
- B. Training of the LARC will be provided by the State office vendor coordinators. Information to be covered in the training includes:
 - 1. Retailer Training
 - a. Why train WIC retailers
 - b. Training materials
 - c. "WIC" message
 - d. Contact with retailers
 - e. New retailers
 - f. Current retailers
 - g. Annual training
 - h. Dealing with store complaints
 - i. Dealing with participant complaints
 - 2. Initial Store Visits
 - a. Educational Buys
 - b. Monitoring Visits

- C. Monitoring Visits & Educational Buys

1. Upon written request of the State office the LARC will do educational buys at specified WIC retailers. The coordinator must file a written report of the educational buy to the State office within 60 (sixty) days of the date of request.
2. The purpose of the educational buy will be to determine what problems may exist at retailers, or to verify complaints filed by WIC participants. The results of the educational buy will be discussed immediately after the purchase with the store manager or owner.

D. Retailer Training

1. Upon request of the State WIC Office, the LARC will hold interactive training sessions for the local area authorized retailers. Other training may be provided on an as needed basis.

E. Initial Retailer Visit

1. An initial visit will be made to prospective WIC retail grocery stores to ensure the required varieties of authorized foods are available, and to verify prices. This visit may be made by the LARC upon written request of the State WIC Office vendor coordinators.
2. The LARC will schedule an appointment with the owner/manager of the retail store to discuss more detailed aspects of the WIC Program. An in-store walk-through will be made to complete an inventory of approved WIC foods in stock. The report must be signed by both the WIC representative and the store owner/manager. This initial visit must be made and documented before the grocery store may be authorized as a retailer.

F. Retailer Complaints

1. It is the responsibility of the LARC to respond to either written or verbal complaints from authorized retailers concerning potential or actual program abuse by WIC participants.
2. The complaint and the resulting actions must be documented in the participant's file, with a copy sent to the State office.

G. Participant Fraud and Abuse

1. It is the responsibility of the LARC to ensure participant fraud and abuse is followed up on and documentation is sent to the State office. The follow up documentation will be reviewed by the State's monitoring teams.

H. Participant Complaints

1. It is the responsibility of the LARC to investigate either written or verbal complaints made by WIC participants concerning activities at authorized WIC retailers. The LARC should contact the retailer owner/manager to discuss the complaint. The results of the conversation must be documented.
2. A separate complaint file must be maintained of all complaints received by the LARC and the action taken. Copies of the complaints and action should be forwarded to the State office. This follow up documentation will be reviewed by the State's monitoring teams.